

October 26, 2004 (7:31AM)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONOFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD PANEL

In the Matter of

Docket No. 52-007-ESP

Exelon Generation Company, LLC

ASLBP No. 04-821-01-ESP

(Early Site Permit for Clinton ESP Site)

**SECOND ADDITIONAL DISCLOSURES OF INTERVENORS
ENVIRONMENTAL LAW AND POLICY CENTER,
BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE,
NUCLEAR INFORMATION AND RESOURCE SERVICE,
NUCLEAR ENERGY INFORMATION SERVICE, AND PUBLIC CITIZEN**

Pursuant to 10 C.F.R. 2.336(a) and (d), Intervenors Environmental Law and Policy Center, Blue Ridge Environmental Defense League, Nuclear Information and Resource Service, Nuclear Energy Information Service, and Public Citizen hereby provide additional disclosures that are relevant to the Intervenors' Clean Energy Alternatives Contention that the Licensing Board Panel admitted in its August 6, 2004 Memorandum and Order. These disclosures are an update to Intervenors' prior disclosures, the most recent of which were filed on October 12, 2004.

I. Expert Witness

No update since October 12, 2004 disclosure.

II. Documents, Data Compilations, and Tangible Things

Pursuant to 10 C.F.R. 2.336(a)(2), Intervenors disclose a description by category and location of the following additional documents in their possession that may be relevant to the Clean Energy Alternatives contention.

1. *The Economic Future of Nuclear Power*. University of Chicago. August 2004. This document provides a number of cost projection scenarios for nuclear power and gas- and coal-fired generation. It is available at: http://www.anl.gov/Special_Reports/NuclEconSumAug04.pdf

2. *Annual Energy Outlook 2004 With Projections to 2025*. United States Department of Energy, Energy Information Administration. January 2004. This document forecasts and analyzes energy supply, demand, and prices in the United States through 2025. It is available online at: <http://www.eia.doe.gov/oiaf/aeo/index.html>.

III. Privilege Log

Pursuant to 10 C.F.R. 2.336(a)(3), Intervenors provide the following list of additional relevant documents for which a claim of privilege or protected status is exercised. All documents are being withheld on the basis of the attorney-client privilege, litigation strategy privilege, and/or work product doctrine.

DATE	AUTHOR	DOCUMENT TYPE DESCRIPTION	RECIPIENT(S)
October 14, 2004	Bruce Biewald	Email Regarding response strategy to Exelon's answer to the NRC Staff's Request for Additional Information ("RAI") about Clean Energy Alternatives and forwarding Exelon's answer	Shannon Fisk
October 14, 2004	Shannon Fisk	Email Regarding response strategy to Exelon's answer to the RAI and relevant legal standards at issue in this proceeding	Bruce Biewald
October 18, 2004	Shannon Fisk	Email Regarding issues likely to arise during and after October 19 prehearing conference call and relevant legal standards at issue	Howard Learner
October 18, 2004	Bruce Biewald	Email and Document Regarding initial analysis and response strategy to Exelon's answer to the RAI	Shannon Fisk
October 18, 2004	Shannon Fisk	Email and Document Forwarding with comment initial analysis and response strategy to	Howard Learner

		Exelon's answer to the RAI	
October 24, 2004	Howard Learner	Email Regarding procedures for hearing on admitted contention	Shannon Fisk
October 25, 2004	Shannon Fisk	Email Regarding procedures for hearing on admitted contention	Howard Learner
October 25, 2004	Howard Learner	Email Regarding procedures for hearing on admitted contention	Shannon Fisk


Dated: October 25, 2004

Respectfully Submitted,

 1/87

Attorney on Behalf of Petitioner
Blue Ridge Environmental Defense League

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CERTIFICATION OF SHANNON FISK

Pursuant to 10 C.F.R. 2.336(c) I, Shannon Fisk, an attorney, hereby certify as follows:

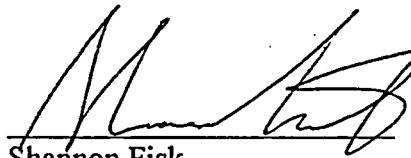
1. I am an attorney employed by the Environmental Law & Policy Center, located at 35 East Wacker Dr., Chicago, IL 60601, and I am one of the counsel for Intervenor Environmental Law and Policy Center, et al. in the above-captioned docket.

2. Included with this certification are the additional disclosures required under 10 C.F.R. 2.336(a) and (d) for the Intervenor that I and my co-counsel Howard A. Learner represent in the above-captioned docket.

3. To the best of my knowledge, the attached disclosures include all additional relevant materials required by 10 C.F.R. 2.336(a) and (d) and are accurate and complete as of the date of this certification.

I certify under penalty of perjury that the foregoing is true and correct.

Signed on October 25, 2004.



Shannon Fisk
One of the Attorneys for the
Intervenor Environmental Law and Policy Center

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NUCLEAR REGULATORY COMMISSION

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Docket No. 52-007-ESP

ASLBP No. 04-821-01-ESP

CERTIFICATE OF SERVICE

I, Shannon Fisk, hereby certify that copies of the Second Additional Disclosures of Intervenor Environmental Law and Policy Center, Blue Ridge Environmental Defense League, Nuclear Information and Resource Service, Nuclear Energy Information Service, and Public Citizen in the above captioned proceeding have been served on the following via electronic mail and by deposit in the U.S. mail, first class, on this 25th day of October, 2004.

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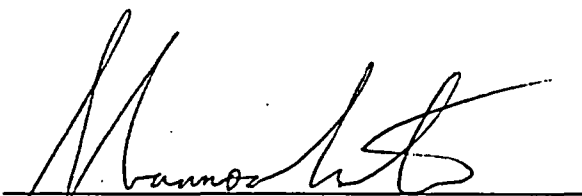
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A handwritten signature in black ink, appearing to read "Shannon Fisk", written over a horizontal line.

Shannon Fisk
One of the Attorneys for the
Environmental Law and Policy Center